

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

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U.S. District Court
Middle District of TN

UNITED STATES OF AMERICA ex rel.

JEFFREY H. LIEBMAN and DAVID

STERN, M.D., Relators

Case No. 3:17-CV-00902

vs

METHODIST LE BONHEUR

HEALTHCARE and METHODIST

HEALTHCARE-MEMPHIS

HOSPITALS

Defendants.

Proposed

Plaintiff Intervenor

MOTION TO INTERVENE

INTRODUCTION

I Mary Page seek to participate as a plaintiff-intervenor in the above-captioned lawsuit.

First, Entitlement to intervene in this case is a matter of right under Federal Rule of Civil Procedure 24(a)(2) and 24(b)(1)(B). Intervention is particularly necessary given that I am a victim of the fraud.

Second, allowing intervention is necessary as a relator as I obtain evidence in my possession of the fraud. Documentary evidence will prove a claim against the transaction that is subject of the action and support intervention as of right.

Thirdly, the named Relators plainly do not adequately represent the federal government, and circuit precedent is clear that allowing intervention is necessary under these circumstances. In the alternative, I respectfully request permissive intervention in this lawsuit to be granted pursuant to Rule 24(b).

I. FACTUAL BACKGROUND

- In the year 2016 I was diagnosed with cancer in Memphis, Tennessee and became a patient of Methodist Healthcare and West Clinic.
- While being a patient of Methodist Healthcare and West Clinic I discovered discrepancies on my Medicare statements.
- The documents in my possession will prove a claim against the transaction.

JURISDICTION AND VENUE

This Court has jurisdiction over the subject matter and parties pursuant to 28 U.S.C. § 1331, as this case involves questions of federal law. This Court also has jurisdiction pursuant to 28 U.S.C. § 1343 because Plaintiff-Intervenor seeks damages for violation of civil rights.

CLAIM FOR RELIEF

- Plaintiff-Intervenor is a “person within the jurisdiction of the United States.”
- Defendants, their agents, employees, and vendors created a scheme to defraud Plaintiff-Intervenor.
- Defendants’ unlawful actions were intentional, willful, malicious, and/or done with reckless disregard to Plaintiff-Intervenor’s Identity and Healthcare.
- Defendants, their agents, employees and/or vendors took material adverse actions against Plaintiff-Intervenor by knowingly transferring identification for unlawful use.

Mary Page

Proposed Intervenor

Dated: October 29, 2022

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